

HOGAN & HARTSON LLP

Attorneys for Defendant
875 Third Avenue
New York, NY 10022
Phone (212) 918-3000
Facsimile (212) 918-3100

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TOTALMAR NAVIGATION CORP., : X
: :
: :
Plaintiff, : Index No. 08-cv-1659 (HB)
-against- : ECF Case
: :
: :
ATN INDUSTRIES INC., :
: :
: :
Defendant. :
: :
----- X

PLEASE TAKE NOTICE THAT, upon the declaration of John F. O'Sullivan, Esq., sworn to June 25, 2008; and the exhibits attached thereto; the accompanying memorandum of law; and upon all of the pleadings and papers heretofore served in this action, Defendant ATN Industries, Inc. ("ATN") will move this honorable Court at the United States District Court, United States Courthouse, 500 Pearl Street, New York, New York, 10007, on such date and time as the Court sets, for an Order to vacate or reduce ex parte order of maritime attachment, pursuant to Rules B, E(4)(f) and E(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, and for such other relief as the Court deems just and proper.

Dated: New York, New York
June 25, 2008

Respectfully submitted,

By _____/s/_____

George F. Hritz
Hogan & Hartson LLP
875 Third Avenue
New York, NY 10022
Tel: (212) 685-8000
Email: gfhritz@hhlaw.com

John F. O'Sullivan
Hogan & Hartson LLP
Mellon Financial Center
1111 Brickell Avenue, Suite 1900
Miami, FL 33131
Tel: (212) 918-3000
Fax: 305-459-6550
Email: jfosullivan@hhlaw.com

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
TOTALMAR NAVIGATION CORP., :
: :
: Plaintiff, : Index No. 08-cv-1659 (HB)
-against- : ECF Case
: :
ATN INDUSTRIES INC., :
: :
: Defendant. :
: :
----- x

AFFIRMATION OF SERVICE

George F. Hritz affirms under penalty of perjury:

I am an attorney admitted to practice in the State of New York and am a partner with the law firm of Hogan & Hartson LLP, attorneys for defendant in the above-captioned matter.

I certify that on June 25, 2008, I electronically filed the Notice of Motion to Vacate or Reduce Ex Parte Order of Maritime Attachment with the Clerk of Court using CM/ECF, and it is being served this day on all counsel authorized to receive Notices of Electronic Filing generated by CM/ECF, including counsel below:

Rahul Wanchoo, Esq.
Law Offices of Rahul Wanchoo
Empire State Building
350 Fifth Avenue, 59th Floor
New York, New York 10118
Attorneys for plaintiff Totalmar Navigation Corp.

Dated: June 25, 2008
New York, New York

George F. Hritz